

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Application No. 10/670,524

Atty Docket No. Q77632

**REMARKS**

Independent claims 1 and 3, and dependent claims 7, 8, 10, 11, 13, 14, 16, 17, 19 and 20 have been rejected under § 103(a) as allegedly being unpatentable over Guss in view of Fuchs.

In the Response to Arguments section of the Office Action, the Examiner alleges that the Applicant does not claim a flat cable, but rather a waterproofing structure for an auxiliary machinery that is connected to a flat cable. Applicants have amended claims 1 and 3 to recite that the connecting structure receives a flat cable. Applicants have also amended claims 2-4 and 13-15 to be consistent with claims 1 and 3. Applicants now traverse this rejection.

The combination of Guss and Fuchs does not disclose or suggest at least a connecting structure for auxiliary machinery comprising a discrete connection terminal which receives said flat cable in which conductors are surrounded by an insulating covering and are arrayed in a flat configuration, as set forth in independent claim 1. The Examiner concedes that Guss fails to disclose or suggest at least this configuration. Fuchs does not cure the deficiencies of Guss.

Figures 1-3, 5 and 6 of Fuchs show that the multi-conductor cable 15 is not a flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration as in Applicants' claim 1. Fuchs clearly discloses a round cable. As shown in Fig. 4 of Fuchs, after the wires 14 have been stripped out of the multi-conductor cable 15, the individual wires 14 of the multi-conductor cable 15 are arranged for attachment to the contacts 16. Therefore, Fuchs discloses individual wires arranged in a flat configuration, not a discrete connection terminal configured to receive said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, as set forth in independent claim 1.

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Since neither Guss nor Fuch discloses or suggests at least a connecting structure for auxiliary machinery comprising a discrete connection terminal configured to receive said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination would still not result in the claimed features. Therefore, claim 1 is patentable over the combination of Guss and Fuchs.

Further, the combined references do not disclose or suggest an exposed connecting portion configured to expose a connection between a connection terminal and at least one conductor of a flat cable on an outer surface of a housing, and the exposed connection portion is sealed by a molded part, as set forth in the claim.

Guss discloses that the connection between the connection terminal 23 and the conductor L3 of the cable 18 is hidden in the housing, i.e., connector body 11. Though a connection between the terminal 23 and the circuit board 15 is exposed on an outer surface of the housing 11 and the connection is covered by a lens 16, this connection cannot be sealed by the lens.

In Fuchs, the connection between the connection terminal, contacts 16, and the conductor, wire 14, of the cable 15 is hidden in the housing body 18. Therefore, claim 1 is patentable over the combination of Guss and Fuchs for at least these additional reasons.

Claim 3 contains features similar to the features recited in claim 1 and should therefore be patentable for similar reasons. Claims 7, 8, 10, 11, 13, 14, 16, 17, 19 and 20, which depend from one of claims 1 and 3, are patentable at least by virtue of their dependency.

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Dependent claim 2 has been rejected under § 103(a) as allegedly being unpatentable over Guss and Fuchs, and in further view of Boyle.

By virtue of its dependence from claim 1, claim 2 incorporates a discrete connection terminal configured to receive said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration. The combination of Guss and Fuchs and Boyle does not disclose or suggest at least a connecting structure comprising a discrete connection terminal configured to receive said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, as set forth in the claim.

As established above, the combination of Guss and Fuchs fails to disclose at least these claimed features. Boyle does not cure the deficiencies of Guss and Fuchs.

As illustrated in Fig. 1, Boyle discloses a round multi-conductor cable which terminates in a connector assembly 14 after passing through a strain relief hood 18. Since Boyle clearly discloses a round multi-conductor cable, as opposed to Applicants' claimed discrete connection terminal configured to receive said flat cable having conductors in a flat configuration, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination would not result in the claimed invention. Therefore, claim 2 is patentable over the combined references.

Additionally, as noted above, the combination of Guss and Fuchs fails to disclose or suggest an exposed connecting portion configured to expose a connection between a connection terminal and at least one conductor of a flat cable on an outer surface of a housing, and the exposed connection portion is sealed by a molded part, as set forth in the claim.

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Further, Boyle discloses that the cable 12 is provided on an outer surface of a cable support surface 36 of a connector assembly 14. However, the structure does not provide for reducing the space for connecting the cable in the connector assembly.

For at least these additional reasons, claim 2 is patentable over the combination of Guss, Fuchs and Boyle.

Independent claim 4 has been rejected under § 103(a) as allegedly being unpatentable over Guss and Fuchs, and in further view of Arnett.

The combination of Guss, Fuchs, and Arnett does not disclose or suggest the features of claim 4, which contains features similar to the features recited in claim 1. As established above, the combination of Guss and Fuchs fails to disclose at least a connecting structure for auxiliary machinery comprising a discrete connection terminal configured to receive said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration, as set forth in the claim. Arnett does not cure these deficiencies.

The Examiner relies on Arnett to allegedly disclose a receiving member for mounting the auxiliary machinery. Arnett, however, fails to disclose or suggest the claimed features lacking in the Guss-Fuchs combination. Therefore, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination would not result in the features claimed by Applicants. Thus, claim 4 is patentable over the combination of Guss, Fuchs and Arnett.

Dependent claims 5, 6, 9, 12, 15, 18 and 21 have been rejected under § 103(a) as allegedly being unpatentable over Guss, Fuchs and Arnett, and in further view of Archer.

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The dependent claims incorporate the features of claim 4 which, as established above, are not disclosed or suggested by the combination of Guss, Fuchs and Arnett. Archer does not cure these deficiencies. The Examiner relies on Archer to allegedly disclose an abutting portion in the form of a collar. However, Archer fails to disclose or suggest at least the features of a connecting structure for auxiliary machinery comprising a discrete connection terminal configured to receive said flat cable in which conductors are surrounded by an insulating covering and arrayed in a flat configuration which are deficient in the Guss-Fuchs-Arnett-Archer combination. In view of the above, even if one of ordinary skill in the art at the time the invention was made had been motivated to combine the references, the combination would not result in the claimed invention. Therefore, dependent claims 5, 6, 9, 12, 15, 18 and 21 are patentable over the combination of Guss, Fuchs, Arnett and Archer.

#### **Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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23373

CUSTOMER NUMBER

Date: February 5, 2007